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Via ECF

The Honorable Analisa Torres
United States District Judge
United States District Court
Southern District Of New York
500 Pearl Street
New York, New York 10007

Re: *King Range., Jr. v. Canal Studio Corp. and Stadium Enterprises LLC*
Docket No. 1:22-cv-07646(AT)(VF)

Dear Judge Torres:

We represent the Plaintiff in the above-entitled action. We write pursuant to Your Honor's Order of November 14, 2022, which provides that Plaintiff may move for a default judgment against Defendants Canal Studio Corp. and Stadium Enterprises LLC by December 5, 2022. We write to respectfully ask the Court to extend the deadline by which Plaintiff may move for a default judgment by thirty (30) days to January 4, 2023. The reasons for Plaintiff's request follow.

On November 11, 2022, Plaintiff transmitted copies of the Certificates of Default to Mr. David Kapp, the president of Defendant Canal Studio Corp., and to Farfeth Limited, the parent entity of Defendant Stadium Enterprises LLC. Plaintiff's transmission also advised Defendants that they were at risk of a default judgment. Defendant Canal Studio Corp. responded that it would tender the defense of this action to its insurer. On November 29, 2022, Plaintiff requested an update from defendant Canal Studio Corp. regarding its appearance in this action and awaits a response.

Defendant Stadium Enterprises LLC did not respond to Plaintiff's November 11, 2022 transmission, so Plaintiff re-sent the information to its parent entity on November 30 2022. However, Plaintiff has uncovered a second entity also named Stadium Enterprises LLC formed in Delaware within Farfetch Limited's Securities and Exchange Commission filings. This Delaware entity is apparently separate from the Stadium Enterprises LLC entity formed in New York that Plaintiff served with the Summons and Complaint. Although the Delaware entity is not registered as a foreign entity with the NY Secretary of State, both Stadium Enterprises LLC entities appear to have a relationship to Stadium Goods, the place of public accommodation at issue in this action.

Because Defendant Canal Studio Corp. is working to retain representation in this action through its insurer, Plaintiff seeks an extension of the time by which he must move for a default judgment against Canal Studio Corp. so as avoid motion practice that may prove unnecessary.

With respect to Defendant Stadium Enterprises LLC, Plaintiff seeks an extension of time to determine whether he must amend his Complaint to name the Delaware Stadium Enterprises LLC entity as a Defendant in this Action in addition to, or instead of the New York Stadium Enterprises LLC entity.

Thank you for your time and attention to this matter.

Respectfully,

/s/

Adam S. Hanski, Esq.

GRANTED in part, DENIED in part. By **January 4, 2023**, Plaintiff shall file a letter informing the Court on the status of this action. Plaintiff may renew his requests to move for a default judgment and/or amend his complaint on that date.

SO ORDERED.

Dated: December 2, 2022
New York, New York



ANALISA TORRES
United States District Judge